

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Ammendment of Part 101 of the Commission's)	RM-11043
Rules to Increase Spectrum Use Through More)	
Flexible Antenna Rules for the 10.7 – 11.7)	
GHz Band		

COMMENTS OF NEXTWEB, INC.

This fixed-wireless service provider hereby submits comments in support of the Petition for Rulemaking made by FiberTower, Inc. in the above-captioned proceeding.¹

I. INTRODUCTION.

NextWeb, Inc. currently provides broadband wireless service to over 2,000 small to medium-sized enterprises in California over its fixed wireless network. NextWeb uses Part 101 licensed microwave links for its redundant wireless backbones to interconnect its base stations and deliver aggregate traffic to Internet exchanges and transit providers. NextWeb also uses Part 101 licensed microwave links to deliver 100 Mbps Ethernet service to high-bandwidth users on its network. NextWeb primarily uses the 18 GHz band for these licensed microwave connections. NextWeb would like to use the 10.7 – 11.7 GHz (11 GHz) band for this application but has been greatly limited by the difficulty of installing 4' dishes at its locations. Therefore, NextWeb wishes to support this petition in order to allow greater flexibility in the choice of frequency bands available to serve the public demand for its service.

¹ RM-11043 (received July 23, 2004).

II. DISCUSSION.

A. Desirability and Under-Utilization of 10.7 – 11.7 GHz band.

NextWeb agrees with the Petitioner that the 11 GHz band is desirable due to the difficulty it has occasionally experienced in locating licensed spectrum for its high-capacity backhaul links in the other Part 101 bands². In addition, even with only 2' antennas, NextWeb has found that some paths would be sufficiently reliable for the level of service needed by its customers at 11 GHz whereas higher frequencies would not be capable of delivering adequate reliability. However, due to the difficulty of installing 4' antennas, especially on the rooftops that comprise the majority of its base station locations, (weight, visual impact, cost, etc. as highlighted in the petition), NextWeb notes that the 11 GHz band is under-utilized at present.

B. Well-worded Argument in the Petition.

NextWeb finds that the argument presented in the petition is well-worded and covers the important technical requirements and various user scenarios. There is no question that the flexibility to use 2' antennas will increase the utilization of the 11 GHz band and ease congestion, and that this is a sorely needed public benefit. While NextWeb generally encourages the use of directional antennas, it should be noted that the proposed 2' antenna has only 3.5 degree 3dB beamwidth, and comparable front/back ratios of the 4' antenna. The 2' antenna is still a highly directional antenna at 11 GHz.

² The 6 GHz band has long been hoarded by private users and carriers and is rarely available due to the challenge of coordinating with satellite users; the 10.5 GHz band does not provide sufficient payload; and the 18 GHz and 23 GHz bands are both highly used and suffer greater amounts of rain-fading.

C. Proposed Specific Re-wording of the Rules Appears Practical

NextWeb, Inc. has reviewed the proposed re-wording of the rules contained in FiberTower's petition and finds that the approach taken by this petition appears to be highly practical and workable in actual implementation. The proposed text cleverly allows for the use of 2' antennas by some users without impacting the more stringent requirements of those users employing 4' antennas.

III. CONCLUSION.

NextWeb, Inc. is convinced that this petition should be accepted by the FCC due to its significant benefit to the public interest.

Respectfully submitted,

Graham Barnes

s/_____

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